

**EXHIBIT B**  
**to Declaration of Rachel S. Doughty**

1 NICHOLAS J. HOFFMAN (SBN 284472)  
nhoffman@mcguirewoods.com  
2 ARIA HANGVAL (SBN 336933)  
ahangval@mcguirewoods.com  
3 McGuirewoods LLP  
Wells Fargo Center – South Tower  
355 S. Grand Avenue, Suite 4200  
4 Los Angeles, California 90071-3103  
Telephone: (213) 457-9840  
5 Facsimile: (213) 457-9877

6 SAMUEL L. TARRY, JR. (*pro hac vice application forthcoming*)  
starry@mccuirewoods.com  
7 McGUIREWOODS LLP  
1750 Tysons Boulevard Suite 1800  
Tysons, Virginia 22102-4215  
8 Telephone: (703) 712-5425  
Facsimile: (703) 712-5185

9 Attorneys for Defendant ETSY, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**12** AS YOU SOW, a 501(c)(3) non-profit corporation,

Case No. 3:24-cv-04203-MMC

Hon. Maxine M. Chesney

**Plaintiff,**

V

ETSY INC. and DOES 1-20, inclusive

## Defendants.

## **DECLARATION OF ALEXANDRA DROZ**

## **DECLARATION OF ALEXANDRA DROZ**

I, Alexandra Droz, declare as follows:

1. I am over the age of 18 and competent to make this Declaration. Unless stated otherwise, the following facts are of my own personal knowledge, and if called upon as a witness, I could and would testify competently thereto.

2. I am the Director, Assistant General Counsel, Regulatory and Competition at Etsy, Inc. (“Etsy”) and have been employed with the company since May 2023. The analytics team, operating under my direction and supervision, recently performed a search of Etsy’s business records for current and historical listings for any of the following products:

- Deluxe Nadinola Bleaching Cream
  - Due Beauty Cream
  - Faiza
  - La Tia Mana Crema Limpiadora y Curativa
  - Miss Key Crema Blanqueadora
  - Jing Zhuang Jinyiqi/“Yiqi”
  - La Magia Blanca de Michelle Marie Crema Blanqueadora
  - Parley Beauty Cream
  - Shivanya Beauty Cream
  - La Unica Cream Casa Botanica

3. I am knowledgeable of or have access to business records concerning all of the information in this declaration, including the sales figures for the foregoing products.

4. In our search, we looked broadly for all product listings for any of the products listed in paragraph 2 above, across all shops on Etsy (including but not limited to those shops specified in Plaintiff's Complaint and in Plaintiff's January 18, 2024 and March 15, 2024

1 Notices of Violation). We then filtered for listings that resulted in sales that shipped to  
2 California buyer addresses. As per the agreed upon settlement structure, we then divided those  
3 listings into the following categories: (1) the total number of units sold from June 7, 2023  
4 through December 22, 2023, with the exception of Faiza (hereinafter, “Settlement Window 1”),  
5 (2) the total number of units sold from December 23, 2023 through the date of this declaration,  
6 with the exception of Faiza (hereinafter, “Settlement Window 2”), (3) the total number of units  
7 of Faiza sold from June 7, 2023 through October 3, 2023 (hereinafter, “Faiza Settlement  
Window 1”), and (4) and the total number of units of Faiza sold from October 4, 2023 through  
8 the date of this declaration (hereinafter, “Faiza Settlement Window 2”). We excluded sales to  
9 Greenfire Law and its agents.

10 5. Etsy’s records indicate that the shop(s) that made sales to California consumers  
11 during the relevant time periods in each Settlement Window for each of the listed products are  
as follows:

Listed Item	Etsy Shop:
Deluxe Nadinola Bleaching Cream	PureJamaicanStore; ShopVensHerbsNGrocer
Due Beauty Cream	MystiqueArtShop
Faiza	MystiqueArtShop; PakistanShop2023; DiamondsGroup; iMinoosh
La Tia Mana Crema Limpiadora y Curativa	NatuMex
Jing Zhuang Jinyiqi/“Yiqi”	IGOTBEAUTYSTORE
Parley Beauty Cream	BeautyBlossomUS; GlowClarify; Perfecttouchunisex;
La Unica Cream Casa Botanica	CasaBotanicastore

18 6. Our search included but did not find any listings for Miss Key Crema  
19 Blanqueadora, La Magia Blanca de Michelle Marie Crema Blanqueadora, or Shivanya Beauty  
20 Cream sold to any Etsy purchasers other than Greenfire Law and its agents.

21 7. The dates(s) of sale and total number of units sold (excluding sales to Plaintiff’s

counsel, Greenfire law, and its agents) in the state of California through Etsy shops for each of the products are as follows:

<b>Product</b>	<b>Date of Sale; Number of Units Sold in California; and Shop which Made Sale</b>
Deluxe Nadinola Bleaching Cream	<ul style="list-style-type: none"> <li>● July 9, 2023; 1 unit; PureJamaicanStore</li> <li>● Aug. 13, 2023; 1 unit; PureJamaicanStore</li> <li>● Nov. 10, 2023; 1 unit; ShopVensHerbsNGrocer</li> <li>● Dec. 19, 2023; 1 unit; ShopVensHerbsNGrocer</li> </ul>
Due Beauty Cream	<ul style="list-style-type: none"> <li>● June 8, 2023; 1 unit; MystiqueArtShop</li> <li>● Jan. 2, 2024; 1 unit; MystiqueArtShop</li> </ul>
Faiza	<ul style="list-style-type: none"> <li>● June 8, 2023; 1 unit; MystiqueArtShop</li> <li>● June 11, 2023; 1 unit; MystiqueArtShop</li> <li>● Aug. 15, 2023; 1 unit; MystiqueArtShop</li> <li>● Sept. 6, 2023; 1 unit; PakistanShop2023</li> <li>● Sept. 20, 2023; 1 unit; PakistanShop2023</li> <li>● Nov. 4, 2023; 2 units; DiamondsGroup</li> <li>● Nov. 5, 2023; 1 unit; iMinoosh</li> </ul>
La Tia Mana Crema Limpiadora y Curativa	<ul style="list-style-type: none"> <li>● July 24, 2023; 1 unit; NatuMex</li> <li>● Aug. 2, 2023; 1 unit; NatuMex</li> <li>● Aug. 29, 2023; 1 unit; NatuMex</li> <li>● Sept. 22, 2023; 1 unit; NatuMex</li> <li>● Sept. 23, 2023; 1 unit; NatuMex</li> </ul>
Jing Zhuang Jinyiqi/“Yiqi”	<ul style="list-style-type: none"> <li>● July 6, 2023; 1 unit; IGOTBEAUTYSTORE</li> <li>● July 14, 2023; 1 unit; IGOTBEAUTYSTORE</li> <li>● Aug. 24, 2023; 1 unit; IGOTBEAUTYSTORE</li> <li>● Oct. 19, 2023; 4 units; IGOTBEAUTYSTORE</li> <li>● Oct. 19, 2023; 20 units; IGOTBEAUTYSTORE</li> <li>● Jan. 16, 2024; 2 units; IGOTBEAUTYSTORE</li> </ul>
Parley Beauty Cream	<ul style="list-style-type: none"> <li>● July 11, 2023; 2 units; BeautyBlossomUS</li> <li>● Nov. 4, 2023; 2 units; GlowClarify</li> <li>● Dec. 31, 2023; 1 unit; Perfecttouchunisex</li> </ul>
La Unica Cream Casa Botanica	<ul style="list-style-type: none"> <li>● Oct. 9, 2023; 1 unit; CasaBotanicastore</li> <li>● Oct. 20, 2023; 1 unit; CasaBotanicastore</li> <li>● Nov. 9, 2023; 1 unit; CasaBotanicastore</li> <li>● Jan. 8, 2024; 1 unit; CasaBotanicastore</li> <li>● Jan. 19, 2024; 1 unit; CasaBotanicastore</li> <li>● Jan. 27, 2024; 1 unit; CasaBotanicastore</li> <li>● Jan. 31, 2024; 1 unit; CasaBotanicastore</li> <li>● Feb. 7, 2024; 1 unit; CasaBotanicastore</li> </ul>

8. The Settlement Window 1 sales consist of 44 units.

9. The Settlement Window 2 sales consist of 9 units.

10. The Faiza Settlement Window 1 sales consist of 5 units.

1       11. The Faiza Settlement Window 2 sales consist of 3 units.  
2  
3

4  
5  
6  
7       I declare under penalty of perjury under the laws of the State of California and the  
8       United States of America that the foregoing is true and correct.  
9

10      Executed on January 24, 2025, at Pittsburgh, Pennsylvania.  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21

Signed by:  
  
Alexandra Droz  
8B7EE4ED1E3B434